REMARKS

Claims 1-21 are pending in the application.

Claims 1-21 have been rejected.

Rejection of Claims under 35 U.S.C. § 102

Claims 8-11 stand rejected under 35 U.S.C. §102(e) as being anticipated by

U.S. Patent No. 5,946,696 issued to Young ("Young"). *See* Office Action, p. 2.

Applicants respectfully traverse this rejection.

Cited Sections of Young Fail to Teach Storage Objects

Regarding claim 8, the Office Action asserts that

Young discloses a method comprising a computer system (200, figure 2) creating a first storage object (original object 100, figure 1A), wherein the first storage object is created to have a individual or collective properties (120, figure 1E and col. 3 lines 32-38, i.e., unmodified properties of object 100 including border, border size, font, text size, text justification and style)..."

See Office Action, pp. 2-3. Thus, the Office Action equates Young's original object 100,

as shown in FIG. 1A, with the first storage object of claim 8. However original object

100 is not a storage object. Young states that original object 100 "is a text box displayed

on a video display by a computer program." *See* Young 3:14-20. One with ordinary skill

in the art at the time of invention would not understand a text box displayed on a video

display to be the same thing as a hard disk, JBOD storage system, RAID storage system,

a data mirror, etc.

The Assertion that Young Teaches Both that the Second Storage Object Depends and No Longer Depends on the Properties of the First Storage Object is Inconsistent under the Interpretation of Young Offered by the Office Action

However, even if Young did teach creating a first storage object, it follows from the interpretation of Young asserted by the Office Action that the cited sections of Young cannot, in a *logically consistent* manner, teach both (1) the limitation of claim 8 that the "second storage object depends on the individual or collective properties of the one or more first storage objects" and (2) the limitation of claim 8 "that the second storage object can no longer depend on the individual or collective properties of the one or more first storage objects."

The Office Action asserts that Young discloses

> ...the computer system creating a second storage object (modified object 100, figure 1B) out of the first storage object, wherein the second storage object depends on the individual or collective properties of the first storage object (col. 3 lines 36-40, i.e., modified object having modified property list 122 including the same properties on border size font and text size as the original object), and the computer system receiving information that at least one of the individual or collective properties of the one or more first storage objects has changed (figure 1E and col. 3 lines 23-27, difference property list 124 indicates one of the individual or collective properties of the one or more first storage objects 120, including border, text, justification and style, has changed) and that the second object can no longer depend on the individual or collective properties of the one of more first storage object (figure 1E and col. 3 lines 40-45, i.e., each property that was modified contains the new value)...

Thus, the Office Action equates Young's modified object 100 with claim 8's second storage object, and argues that, since Young's modified object 100 has modified property list 122, Young teaches the creation of a second storage object that depends on the individual or collective properties of the first storage object. Further, the Office Action asserts that, since certain properties of original object 100 were modified to obtain modified object 100 such that "each property that was modified contains the new value," Young teaches that the second object can no longer depend on the individual or collective properties of the one or more first storage objects.

Application No.: 10/790,656

However, Applicants point out that, according to Young, it is *simultaneously* true that (1) Young's modified object 100 has modified property list 122 and (2) that "each property that was modified contains the new value." *See* Young 3:23-45. Thus, according to the interpretation of Young asserted by the Office Action, it is *simultaneously* true that (1) Young teaches the creation of a second storage object that depends on the individual or collective properties of the first storage object and that (2) Young teaches that the second object can no longer depend on the individual or collective properties of the one or more first storage objects. Thus, the interpretation of Young asserted by the Office Action, leads to a contradiction. It cannot *simultaneously* be the case that a given storage object both depends and no longer depends upon a given property, set of properties, or any other thing. A storage object must either depend upon or not depend upon a thing. It cannot simultaneously do both.

Request for Reconsideration and Withdrawal

Thus, for at least the reasons stated above, including the facts that (1) the cited sections of Young fail to teach "creating a first storage object," and (2) the cited sections of Young cannot consistently teach both that the second storage object "depends" and "no longer depends" on the properties of the first storage object, Applicants respectfully request the reconsideration and withdrawal of the rejection of claim 8. Since all other rejected claims are dependent upon claim 8, Applicants further request the reconsideration and withdrawal of the rejection of these claims.

Rejection of Claims under 35 U.S.C. § 103

Claims 1-5, 12-16 and 19-21

Claims 1-5, 12-16 and 19-21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,826,600 issued to Russell ("Russell") in view of U.S. Patent No. 6,065,011 issued to Bulusu et al. ("Bulusu"). *See* Office Action, p. 4. Applicants respectfully traverse this rejection. Bulusu fails to teach the limitation of claim 1 of "the computer system choosing the first storage object to be the component storage object due to the property of the first storage object."

The Office Action cites Bulusu 10:31-67 to support its tacit assertion that Bulusu teaches "the computer system choosing the first storage object to be the component storage object due to the property of the first storage object." However, Bulusu 10:31-67 fails to even mention or discuss any property of Bulusu's original data set 38, which the Office Action equates with the first storage object of claim 1. It is true that Bulusu 10:31-67 mentions the properties of tasks, but these tasks are not Bulusu's original data set 38. Thus, these properties are not presented as properties of original data set 38. Further, while Bulusu 10:31-67 teaches organizing the content of the original data set 38 "into useful groups based upon the selected [task] property" there is no teaching that the first storage object is chosen due to the properties of these tasks.

Russell Would Cease to Function if Global Object Specification 160 Comprised Local Object Specification 150

However, even if Bulusu teaches "the computer system choosing the first storage object to be the component storage object due to the property of the first storage object" and even if Bulusu's data sets are instances of storage objects, the modification of Russell proposed by the Office Action would result in an invention that fails to perform the function for which the invention of Russell was designed according to the principles of Russell.

This follows from the facts that (1) the Office Action equates Russell's local object specification 150 with the first storage object of claim 1 and Russell's global object specification 160 with the second storage object of claim 1 (*see* Office Action p. 4), and (2) Russell teaches against global object specification 160 comprising local object specification 150. Russell teaches against global object specification 160 comprising local object specification 150 since Russell requires that local identification 152 of local object specification 150 be replaced with global object specification 162 to create global object specification 160. *See* Russell 14: 4-54, especially lines 46-50. Thus, global object specification 160 cannot comprise local object specification 150 since Russell teaches that global object specification 160 fails to comprise at least some part of local object specification 150, namely local identification 152. Thus, the invention disclosed in Russell would fail to perform, according to the principles of Russell, the function for which the invention of Russell was designed if Russell was modified such that the first storage object (local object specification 150) was chosen to be the component storage object which the second storage object (global object specification 160) comprises.

Request for Reconsideration and Withdrawal

Thus, for at least the reasons stated above, Applicants request the reconsideration and withdrawal of this rejection against claim 1. Likewise, since independent claims 12, 19, 20, and 21 are rejected for the same reasons as claim 1 (*see* Office Action, pp. 6 and 7) Applicants respectfully request the reconsideration and withdrawal of the rejection of claims 12, 19, 20, and 21. Finally, since all remaining rejected claims are dependent upon one of the independent claims 1, 12, 19, 20, and 21, Applicants respectfully request the reconsideration and withdrawal of the rejection against all remaining rejected claims.

Claims 6-7 and 17-18

Claims 6-7 and 17-18 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,826,600 issued to Russell ("Russell") in view of U.S. Patent No. 6,065,011 issued to Bulusu et al. ("Bulusu"), and further in view of U.S. Patent Application No. 2003/0229698 issued to Furuhashi et al. ("Furuhashi"). *See* Office Action, p. 7. Applicants respectfully traverse this rejection on the grounds that claims 6-7 and 17-18 are dependent upon one of allowable base claims 1 and 12. Therefore Applicants respectfully request the withdrawal of this rejection.

CONCLUSION

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5093.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicant hereby petitions for such extensions. Applicant also hereby authorizes that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,
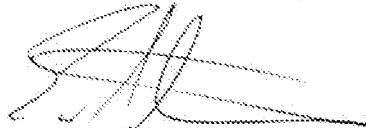
Eric A. Stephenson
Attorney for Applicants
Reg. No. 38,321
Telephone: (512) 439-5093
Facsimile: (512) 439-5099